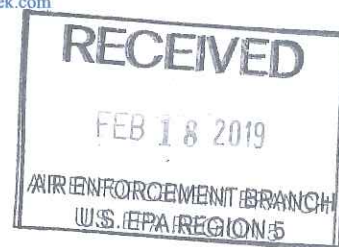




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January 17th, 2019

Mark Belmer
St. Vincent DePaul Lane County Inc.
1175 Hwy 99 North
Eugene, O.R. 97402

Dear Mr. Belmer,

Intertek-Columbus is an independent analytical testing laboratory specializing in refrigeration chemistry. This focus enables Intertek to provide services dedicated to the specific needs of the air conditioning and refrigeration industry. Intertek provides testing for refrigerant producers, refrigeration wholesalers, reclaimers and contractors as well as refrigerant reclamation and recovery/recycle devices.

These services include:

Refrigerant analysis to AHRI 700-2017, SAE and military specifications

Lubricant analysis for preventive maintenance, retrofit and wear
Analysis for air conditioning and refrigeration systems

Materials compatibility testing of alternative refrigerants and lubricants

Performance evaluations for HVAC/R products for energy efficiency,
capacity and overall performance, refrigeration system components,

As a result of this and related work, Intertek is uniquely knowledgeable of technical, safety and environmental considerations of the air conditioning and refrigeration industry.

Intertek has been directly involved with AHRI Standards since their inception. Intertek is currently participating on several technical committees to further the development and advancement of analytical methodologies, alternative technologies and technical innovations in the air conditioning and refrigeration industry.

Intertek is the independent testing laboratory for AHRI 700-2017 Certification program for refrigerant reclaimers.

Intertek hereby acknowledges that refrigerant analysis in accordance with AHRI 700-2017 can be processed for St. Vincent DePaul Lane County Inc. Left over refrigerant is either recovered, reclaimed or destroyed.

Approved,

A handwritten signature in cursive script, appearing to read 'John Senediak'.

John Senediak
Senior Chemist
Intertek Columbus

NT

Attn: Compliance Tracker, AE-18J

Air Enforcement and Compliance Assurance Branch

U.S. Environmental Protection Agency - Region 5

77 W. Jackson Boulevard

Chicago, Illinois 60604

This submission is in response to the EPA information request received by St. Vincent de Paul Society of Lane County, Inc. on December 28, 2018. Each response below is in response to Appendix B of the information request.

Question 1.

- a. Does SVDP recover refrigerant from appliances including small appliances?
Yes, St. Vincent de Paul recovers refrigerant from appliances and small appliances.
- b. Does SVDP reclaim refrigerant that has already been recovered by others?
Yes, St. Vincent de Paul reclaims refrigerant which has already been recovered by others.
- c. Does SVDP recover refrigerant from appliances and then reclaim or recycle the refrigerant?
Yes, St. Vincent de Paul recovers refrigerant from appliances and then reclaims the refrigerant.

Question 2.

Below is a detailed description of our refrigerant reclamation, recovery and recycling processes from the step where items enter our facility to the step where refrigerant leaves our facility.

We primarily receive appliances for recycling from the general public and waste transfer stations. We also occasionally receive containers of refrigerant gases businesses and individuals.

Gases are extracted from the appliances to containers using industry standard recovery equipment. All refrigerant gases are sent through a gas chromatograph mass spectrometer to determine purity I.E. gas mix. A gas mix which exceeds our ability to reclaim it will be sent to a reclaim facility specializing in mixed gasses, and transferred to cylinders provided by the reclaimer via a liquid vapor push pull method. weight recorded and shipped common carrier adhering to all I.A.T.A. regulations.

gas that is reclaimable will be reclaimed onsite a one pound sample will be sent to Intertek testing strictly adhering to I.A.T.A. regulations once verified for, air, water, other refrigerants, acid, oil,

and particulates, it is transferred into D.O.T.39 cylinders using liquid pump method weight is taken. Product is then made available to licensed technicians and regulated wholesalers. All sales are recorded.

Question 3.

This list includes the make and model and serial number of all equipment used to recover, reclaim, and recycle refrigerants.

ReKlame Commercial Refrigerant Recovery/Recycling Equipment. Model PRRU 100-A Serial numbers: 9200169, 9301020, 9301021, 9301012, 9300121.

Robinair Refrigerant Recycling Systems liquid transfer pump

Photos of tanks and equipment supplement this list.

Question 4.

We use a model SRI 8610C gas chromatograph spectrometer to analyze refrigerants.

Question 5.

For the period of November 1, 2015, to October 31, 2018 provide a copy of the documentation that SVDP generates that each batch of reclaimed refrigerant meet the specifications in Appendix A of 40 C.F.R. Part 82, Subpart F, which are based on AHRI standard 700-2016, Specifications for refrigerants that are applicable for each refrigerant.

Between the dates of November 1, 2015, to October 31, 2018, we have not reclaimed any refrigerants. All gases in need of reclamation have been sent to a third party refrigerant reclamation company.

Question 6.

From the period of November 1, 2015, to October 31, 2018 the gases released during the reclamation process were near zero and unmeasurable.

Question 7.

Provide names and address of persons who sent SVDP material for reclamation and the quantity of material. We have provided the combined mass of refrigerant and contaminant by refrigeration type sent to St. Vincent de Paul Society of Lane County Inc.

We do not collect names and addresses of persons who send SVDP materials for reclamation. We can change this policy and begin collecting names and dresses if requested.

Question 8.

Please describe SVDP's practice for disposal of wastes from recovery, recycling, and reclamation below.

SVDP sends wastes for recovery to A-Gas for recovery and disposal.

Question 9.

Provide the physical address where SVDP recovers, reclaims, and/or recycles refrigerants.

Previously SVDP recovered, reclaimed and recycled refrigerants at the following address:

St. Vincent de Paul

705 S. Seneca Road

Eugene, OR 97402

Beginning in 2017: SVDP recovers, reclaims and recycles refrigerants at the following address:

St. Vincent de Paul

1175 Highway 99 N

Eugene, OR 97402

To whom it may concern, regarding all of the preceding information in this document:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my enquiry of those individuals with primary responsibility for obtaining information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of imprisonment and pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. 1001 and 1341.

Signature: Mark A Belmer

Printed Name: Mark Belmer

Date: 1-19-19